



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

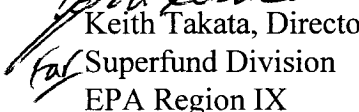
75 Hawthorne Street  
San Francisco, CA 94105-3901

May 20, 1998

## MEMORANDUM

SUBJECT: Response to National Remedy Review Board Memorandum  
on the Montrose/Del Amo Groundwater Operable Unit

TO: Bruce Means, Chair  
National Remedy Review Board  
Office of Emergency and Remedial Response (5202G)

FROM:  Keith Takata, Director  
Superfund Division  
EPA Region IX

We have reviewed and considered the statements of the National Remedy Review Board (NRRB) on the Montrose/Del Amo sites, Dual Site Groundwater Operable Unit, in its memorandum dated June 24, 1997. We are placing the memorandum and this response in the Administrative Record for the Proposed Plan for this operable unit.

The June 24, 1997 memorandum documents the NRRB's support for Region IX's preferred alternative. The NRRB did not make additional recommendations, but did make a statement in conjunction with its support. Our response to this statement follows. Please note that as the public comment period on the proposed plan has not yet occurred, we will be taking into account all public comments that we receive before selecting a remedial alternative. If, after reviewing public comments, we decide to reconsider our preferred alternative, we will consult further with you.

The NRRB's June 24, 1997 memorandum makes the following statement: *"The Board is aware that the Region's preferred alternative may trigger additional and costly supplemental treatment alternatives to address a potential State ARAR for parachlorobenzene sulfonic acid (p-CBSA) reinjection. However, the Board believes that a careful design and phased implementation of the alternative can control potential costs associated with meeting this potential ARAR."*

We recognize that some treatment of the p-CBSA in extracted groundwater may be required as part of this proposed remedy prior to aquifer reinjection of the water. We concur with the Board that significant actions can be taken in the remedial design phase to limit additional costs associated with addressing this contaminant. We intend to keep this objective in mind during the remedial design phase.

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Region IX appreciates the NRRB's support of its preferred alternative and suggestions for ways to improve remedy implementation. We look forward to working with you and the Region 1/9 Accelerated Response Center in EPA Headquarters in the future.

cc: Murray Newton, Region 1/9 Center